## IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF MISSOURI WESTERN DIVISION

UNITED STATES OF AMERICA,	)
Plaintiff,	)
VS.	) Case No. 19-00087-01-CR-W-HFS
CAROL L. DILLE,	)
Defendant.	)

## DEFENDANT'S SECOND MOTION FOR EXTENSION OF TIME TO FILE OBJECTIONS TO PRESENTENCE REPORT

Comes now the defendant, Carol L. Dille, through counsel, Travis D. Poindexter, and respectfully moves this Court to allow defendant an extension until June 19, 2020, to file objections to the presentence investigation report (PSR). In support of this motion, Ms. Dille states the following:

## **SUGGESTIONS IN SUPPORT**

- 1. On January 31, 2020, Ms. Dille entered pleas of guilty to one count of wire fraud and one count of bankruptcy fraud.
- 2. Ms. Dille is currently on bond without issue. Ms. Dille informed counsel that she received the preliminary report by mail on May 1, 2020.
- 3. Counsel needs additional time to investigate, review and research the alleged loss related to the bankruptcy fraud and adequately prepare any objections to the report.

WHEREFORE defendant Carol Dille, respectfully requests this Court enter an

Order granting the defendant until June 19, 2020, to file objections to the PSR.

Respectfully submitted,

/s/ Travis D. Poindexter
TRAVIS D. POINDEXTER
Assistant Federal Defender
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Kansas City, MO 64106
(816) 471-8282
ATTORNEY FOR DEFENDANT

## **CERTIFICATE OF SERVICE**

In accordance with Local Rules, it is hereby CERTIFIED that one copy of the foregoing motion was electronically filed on the ECF system on May 28, 2020.

/s/ Travis D. Poindexter
TRAVIS D. POINDEXTER